

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE: Christopher M. Lincoln</b>	)	<b>Chapter 13</b>
<b>Larue Lincoln</b>	)	<b>Case No. 1:18-bk-00395-HWV</b>
<b>Debtors</b>	)	
	)	
<b>The Huntington National Bank</b>	)	
<b>Movant</b>	)	
	)	
<b>Christopher M. Lincoln</b>	)	
<b>Laurie Lincoln,</b>	)	
<b>Respondents</b>	)	
<b>Charles DeHart, III, Trustee</b>	)	

**DEBTORS' RESPONSE TO MOTION OF THE HUNTINGTON NATIONAL BANK  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362  
PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

1. Movant, The Huntington National Bank, filed its Motion for Relief from Stay on June 1, 2021.
2. Debtors acknowledge some auto payments are past due.
3. Debtors desire the opportunity to cure any post-petition arrears and keep their automobile.
4. Debtors request the Court deny Movant's Motion for Relief.

WHEREFORE, Debtor, Christopher and Laurie Lincoln, prays the Court enter its order denying the Motion for Relief from the Automatic Stay that was filed June 1, 2021 by The Huntington National Bank.

Dated: June 2, 2021

Respectfully Submitted,

/s/Nicholas G. Platt  
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